

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
JERVAZZ BALLARD	:	
	:	
Debtor	:	BANKRUPTCY NO. 17-11010
	:	
	:	
US Bank, NA	:	
Movant	:	

DEBTOR'S OBJECTION TO CERTIFICATION OF DEFAULT

NOW COMES JERVAZZ BALLARD, by and through his attorney Ashley M. Sullivan, Esquire, and hereby files an answer to the Certification of Default filed US Bank, NA.

Debtor has made the post-stipulation mortgage payments during the period as stated in the Notice of Default, and has sufficient funds to cure any remaining delinquency.

WHEREFORE, Respondent respectfully requests that the Certification of Default filed by US Bank, NA be denied.

FREEDMAN AND LORRY, P.C.

BY: /s/ Ashley M. Sullivan

ASHLEY M. SULLIVIAN, ESQUIRE
Attorney for Debtor

CERTIFICATION

Petitioner certifies under penalty of perjury that the matters stated herein are true and correct to the best of her knowledge, information, and belief.

DATE: February 1, 2019

ATTORNEYS FOR DEBTOR

/s/ Ashley M. Sullivan
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